



MOUNTAIN WATER COMPANY

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V.P. and General Manager

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April 14, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Dear Sir or Madam:

Subject: Comments on the Food and Drug Administration's Draft Study Report: Feasibility of Appropriate Methods of Informing Customers on the Contents of Bottled Water (65 FR 8718)

Mountain Water Company appreciates the opportunity to comment to the Food and Drug Administration on the draft study report on the feasibility of appropriate methods of informing customers of the contents of bottled water as published in the February 22, 2000 Federal Register (Volume 65, No. 35, 8718). Mountain Water Company (MWC) is an investor-owned water utility that serves approximately 55,000 people in the cities of Superior, Missoula, and Clarkfork, Montana.

MWC supports the public's right to know about the quality of the water they consume through the Consumer Confidence Report (CCR) requirements. Bottled water should be subject to the same CCR provisions. In particular, those with compromised immune systems often use bottled water. It is important that these consumers and their health care providers have accurate information about the treatment and contents of bottled water.

MWC supports providing certain information on the bottle label and designating a toll-free number and an address for consumers to obtain more information from the bottled water company. At a minimum, the label should contain the source of water, the treatment given to the water, and the level of fluoride. Detailed CCR information should be available to consumers who call or write the company. It would be highly desirable if bottled water companies posted their water quality on the Internet and displayed the web address prominently on the labels of bottled water. In addition, MWC recommends that bulk water suppliers be required to provide a CCR-type report with a bill or invoice on an annual basis. It is important that the FDA develop a regulation to require consistent, accurate label information and CCR reporting requirements.

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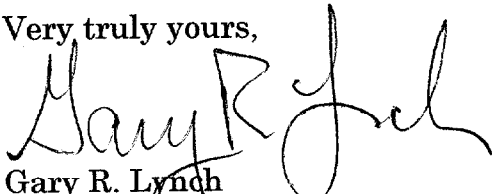
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MWC is concerned with the regulatory schedule. It was the intent of the 1996 Safe Drinking Water Amendments that public information on the content of bottled water be available at the same general time as the CCR requirements for drinking water utilities. This draft study is significantly behind the mandated schedule, and the rulemaking timeline for requiring information was not stated in the Federal Register. MWC recommends that the FDA move rapidly to require minimum bottled water label requirements and detailed CCR information on the contents of bottled water for interested consumers.

Thank you for your consideration of the comments in this letter. Please contact me at (562) 923-0711 extension 201 if you have any questions.

Very truly yours,

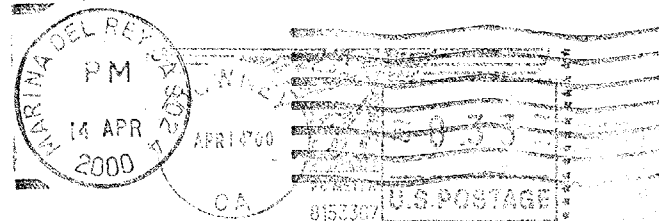


Gary R. Lynch
Vice President of Water Quality

cc: Senator Max Baucus
Senator Conrad Burns
Representative Rick Hill
Mr. Alan Roberson, American Water Works Association



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